

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 20-cv-1319 (JRT/JFD)

This Document Relates To:

ALL CASES

**DECLARATION OF EDDIE HASDOO IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL THE PRODUCTION
OF DATA AND DOCUMENTS**

I, Eddie Hasdoo, declare, pursuant to 28 U.S.C. § 1746, that:

1. I am an associate with the law firm of Jones Day, which represents Defendant National Beef Packing Company, LLC ("National Beef") in the above-entitled matter. I make this Declaration in Support of Defendants' Opposition to Plaintiffs' Motion to Compel the Production of Data and Documents. I am over 21 years of age, suffer no legal disability, and am competent to give this declaration.
2. National Beef has agreed to search the documents of 29 distinct custodians in this matter, including Monte Lowe and Tom Klein.
3. Monte Lowe and Tom Klein have supervision responsibilities related to National Beef's case-ready business.
4. National Beef has agreed to search the documents of 10 general, slaughter, and fabrication managers and 4 field buyers of fed cattle.
5. On July 15, 2022, I received an email from D. Herrera regarding a meet and confer that occurred on July 14, 2022. A copy of that email is found at Herrera Decl., Ex.

M, ECF No. 599-7. The July 15 email was the first time during the parties' extensive meet-and-confer process that Plaintiffs demanded National Beef to provide P&L reports for case-ready facilities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 4, 2022 in Chicago, Illinois

s/ Eddie Hasdoo
Eddie Hasdoo